

PSJ3

Exhibit 252

To: Crowley, Jack[Jack.Crowley@pharma.com]
From: Mahoney, Bill
Sent: Mon 5/17/2010 2:46:05 PM
Subject: RE: Follow up

Jack—

No...what little I hear is centered around mail or Fedex rather than a physical presence down there...

From: Crowley, Jack [mailto:Jack.Crowley@pharma.com]
Sent: Monday, May 17, 2010 2:44 PM
To: de Gutierrez-Mahoney, Bill
Subject: FW: Follow up

Hello Bill:

Have you gotten wind of any groups trying to establish a distribution center or centers in South Florida exclusively for the pain clinic business?

Jack

From: Crowley, Jack
Sent: Wednesday, May 12, 2010 3:09 PM
To: Mahoney, Bill; McDonald, Tom; Oriente, Michael; Gustin, Dave
Subject: Follow up

Gentlemen: - not very good notes, but we can discuss at our next meeting.

Our guest speaker at the New Jersey Pharmaceutical Industry Group Meeting at J&J on Monday featured none other than Joseph Rannazzisi himself. Michael - we need to add you to the mailing list.

No question that DEA is holding "gatekeepers" accountable.

1 ½ hour presentation on Drugs of Abuse - Joe Rannazzisi.

Typical DEA propaganda presentation - the RX problem is huge and growing - you need us, etc.

Currently 34 Tactical Diversion Squads (TDS) - 66 by next year across the U.S. (This will involve an increase in registration fees.)

TDS are comprised of Special Agents and Diversion Investigators from DEA - agents from FBI, OIG, HHS, State and Local Law Enforcement, Disciplinary Boards, other.

DEA Initiative - DEA-sponsored Nationwide Drug Take-back program by this September - get the drugs out of the medicine cabinet - with the schools. (National

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Association of Chiefs of Police; Attorneys General are on board - Industry will be asked to help.)

"Cocktail" or "Holy Trinity" Watch out – this is not legitimate

Hydrocodone (or oxycodone)
Carisoprodol - Soma
Alprazolam - Xanax

National Forensic Laboratory Information System (NFLIS) - oxycodone #1 in submissions

Methods of Diversion

Internet and Pain Clinics

Fake prescriptions – highly organized - west coast

Doctor shopping - states with no prescription monitoring programs

1306.04 Purpose of Issuance of a Prescription

Internet converting to non-controlled substances - Soma, tramadol, etc.

What took the place of internet?

Florida pain clinics - #1 roxicodone – vast majority of patients come from other states.

DEA has shipped a lot of people to Florida - **DEA enforcement action on a daily basis in South Florida.**

These clinics are going nowhere - the Department of Health has licensed 993 clinics in South Florida since they passed the law.

Identifying rogue pain clinics

Clinics are getting "Suboxone (Buprenorphine) certified" - DEA must get a court order for criminal case. Drug Abuse Treatment Act (DATA) of 2000.

Best regards,

Jack

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